



September 20, 2013

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95912

via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

Shield Packaging appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

Shield Packaging a California Inc. is a formulator and packager of aerosol lubricants, hair care products, and household cleaners. We have been in business in California since 1971, and we are one of the last aerosol packagers remaining in California.

Shield has the following comments:

- Shield supports the Multi-purpose Lubricant future effective limit delay. The VOC limit is to become effective on 12/31/2015. More time was needed for research. Staff has delayed the VOC limit to 12/31/2018. This additional time is needed to develop technology to meet this stringent limit.
- Shield supports the change to the Gear, Chain or Wire Lubricant definition to add the exemption for lubricant used on chain driven vehicles. This exemption is needed to preserve products that are solely used on chain driven vehicles. Products made specifically for chain driven vehicles are unique in their formulation. These products would not have performed if the 25% VOC limit was imposed on them, and could have caused safety issues.

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Affiliated Corporations at Dudley, MA & Canton, MA

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- Shield supports the addition of the definitions for Single Purpose Cleaner and Single Purpose Degreaser. Shield produces General Purpose products and Single purpose products. The addition of the definitions provides clarity to the regulation.
- Shield supports the changes to the Multi-purpose lubricant and Dry lubricant definitions. The single use addition to the Multi-purpose lubricant definition is needed to clarify products designed for a single use are not subject to the Multi-purpose lubricant standard. Likewise the Dry lubricant definition change clarifies that Dry lubricants are not subject to other lubricant category VOC limits.
- Shield also supports the staffs' decision to pursue scientific studies on the Low Vapor Pressure (LVP) compounds. The LVP provision is vital to our formulations. We look forward to working with the staff on this issue.

In summary we support the amendments to the Consumer Product Rule. We appreciate the staff willingness to discuss the technical issues with us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donna Lopez', is written over a light blue horizontal line.

Donna Lopez  
New Business Development Manager  
Shield Packaging of California, Inc.

Cc: Carla Takemoto

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